

NAEEM O BETZ, ALL RIGHTS RESERVED - U.C.C.1-207.7, U.C.C.1-207.4, U.C.C.1-308,
U.C.C.1-103.6, U.C.C.3-415, Natural Person IN FULL LIFE, SUI JURIS
IN PROPRIA PERSONA
4244 HILDRETH ST. SE.
WASHINGTON, DC, [20019-9998]
1-202-706-8063

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

NAEEM O BETZ, ALL RIGHTS RESERVED - U.C.C.1-207.7, U.C.C.1-207.4, U.C.C.1-308,
U.C.C.1-103.6, Natural Person IN FULL LIFE, SUI JURIS, IN PROPRIA PERSONA

Plaintiff, Claimant

VS.

CIVIL ACTION No.

RWT 12 CV 3446

CEO - Paul Brennan
PLAZA RECOVERY INC.
370 7TH Avenue Suite 1500
New York, NY 10001

COMPLAINT

Defendant, Respondent

PRELIMINARY STATEMENT

1. This is an action for damages brought from violations of the Fair Credit Reporting Act (FCRA) Title15 U.S.C. §1681 *et seq.*

JURISDICTION

2. The jurisdiction of this Court is conferred by Title15 U.S.C. §1681p.

FACTUAL ALLEGATION

3. On MAY 19, 2011, Defendant initiated a soft pull of Plaintiff's credit report from TRANSUNION without permissible purpose.

COUNT I

**VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), Title15 U.S.C.§1681
WILLFUL NON-COMPLIANCE BY DEFENDANT PLAZA RECOVERY INC.
(DEBT COLLECTOR)**

3. Plaintiff is a consumer within the meaning of the FCRA, Title15 U.S.C.§1681a(c).

4. PLAZA RECOVERY INC.(DEBT COLLECTOR), is a furnisher of information within the meaning of the FCRA, Title15 U.S.C. §1681s-2.

5. PLAZA RECOVERY INC.(DEBT COLLECTOR), willfully violated the FCRA.

Defendant's Violations include, but are not limited to, the following:

(a) PLAZA RECOVERY INC.(DEBT COLLECTOR), willfully violated Title15 U.S.C.§1681b(f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by Title15 U.S.C. §1681b.

WHEREFORE, Plaintiff demands judgment for damages in the amount of \$1,000 a Month from the date of credit pull against consumer credit report.

PLAZA RECOVERY INC.(DEBT COLLECTOR), are liable for actual or statutory damages, and punitive damages, attorney's fees and costs, pursuant to Title15 U.S.C. §1681n.

COUNT II

**VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), Title15 U.S.C. §1681
NEGLIGENT NON-COMPLIANCE BY DEFENDANT, PLAZA RECOVERY INC.
(DEBT COLLECTOR),**

6. Plaintiff is a consumer within the meaning of the FCRA, Title15 U.S.C. §1681a(c).

7. PLAZA RECOVERY INC.(DEBT COLLECTOR), is a furnisher of information within the meaning of the FCRA, Title15 U.S.C.§1681s-2.

8. PLAZA RECOVERY INC.(DEBT COLLECTOR), negligently violated the FCRA.

1 Defendant's violations include, but are not limited to, the following:

2 (a) PLAZA RECOVERY INC.(DEBT COLLECTOR) negligently violated 15 U.S.C.
3 §1681b (f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by
4 Title15 U.S.C. §1681b.

5 **WHEREFORE**, Plaintiff demands judgment for damages in the amount of \$1,000 Month
6 from the date of credit pull against consumer credit report, PLAZA RECOVERY INC.(DEBT
7 COLLECTOR) are liable for actual damages, and attorney's fees and costs, pursuant to Title15
8 U.S.C. § 1681o.

9
10 **RELIEF**

11 **WHEREFORE**, Plaintiff demands judgment for damages against, PLAZA RECOVERY
12 INC.(DEBT COLLECTOR) in the amount \$20,000 for actual or statutory damages, and punitive
13 damages, attorney's fees and costs, pursuant to Title 15 U.S.C.§1681n (a) (3) and Title15 U.S.C.
14 §1681o (a)

15
16 **DEMAND FOR JURY TRIAL**

17 Plaintiff hereby demands a trial by jury of all issues as a matter of law.

18 Respectfully submitted this 21th day of November, 2012

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